

# **EXHIBIT C**

CAUSE NO. 2024-34589

COAST TO COAST TITLE, LLC,	§	IN THE DISTRICT COURT OF
SOL CITY TITLE, LLC, MAGNOLIA	§	
TITLE ARKANSAS, LTD.,	§	
MAGNOLIA TITLE FLORIDA, LLC,	§	
THE PEABODY BULLDOG, LLC,	§	
AND JOHN MAGNESS	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
TYRELL L. GARTH, PHILLIP H.	§	
CLAYTON, DEBBIE MERRITT A/K/A	§	
DEBORAH MERRITT, MATTHEW	§	
D. HILL, CHARLES BURNS, P.	§	
GARRETT CLAYTON, SCOTT M.	§	
REEVES, ARIANE E. YOUNG,	§	
TINGLEMERRITT, LLP STARREX	§	
TITLE FLORIDA, LLC, LAURIE	§	
COOPER, MARKETSTREET	§	
CAPITAL PARTNERS, LLC,	§	
MARKETSTREET CAPITAL	§	
PARTNERS AR, LLC, AND BRIAN	§	
A. BREWER	§	11 <sup>TH</sup> JUDICIAL DISTRICT

**DEFENDANTS STARREX TITLE FLORIDA, LLC, MARKETSTREET CAPITAL PARTNERS, LLC, MARKETSTREET CAPITAL PARTNERS AR, LLC AND BRIAN A. BREWER’S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendants Starrex Title Florida, LLC, Marketstreet Capital Partners, LLC, Marketstreet Capital Partners AR, LLC and Brian A. Brewer, (hereinafter “Brewer Defendants”) and files their Original Answer as follows:

**I. GENERAL DENIAL**

1. Brewer Defendants assert a general denial as authorized by Texas Rule of Civil Procedure 92 and generally deny all the allegations contained in Plaintiffs’ Original Petition. Brewer Defendants respectfully request that Plaintiffs be required to prove the charges and

allegations contained in their petition by a preponderance of the evidence where applicable, or higher burden of proof when required by law.

## **II. PRAYER**

2. Brewer Defendants pray that this Court deny the relief sought by Plaintiffs and that Plaintiffs take nothing. Brewer Defendants further pray that this Court grant Brewer Defendants all such other and further relief to which they may be entitled at law and in equity.

Respectfully submitted,

STILWELL, EARL & APOSTOLAKIS, LLP

By: /s/Steven C. Earl

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Marketstreet Capital Partners AR, LLC and

Brian A. Brewer

**CERTIFICATE OF SERVICE**

This Original Answer was served in compliance with Rules 21 and 21a of the Texas Rules of Civil Procedure on the 9<sup>th</sup> day of July, 2024.

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Filing Description: Defendants Starrex Title Florida, LLC, Marketstreet Capital Partners, LLC, Marketstreet Capital Partners AR, LLC and Brian A. Brewer's Original Answer

Status as of 7/9/2024 12:23 PM CST

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